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DIVISION OF OIL GAS & MINING

February 18, 1993

Larry Anderson, M.P.A.
Director-Division of Radiation Control
Utah Department of Environmental Quality
288 North 1460 West
P. O. Box 16700
Salt Lake City, UT 84116-0700

Dear Mr. Anderson:

Molycorp respectfully requests an opportunity to present information pertaining to the disposition of its Dry Valley NORM material to the Board of Radiation Control, Utah Department of Environmental Quality.

We have recently been advised by Mr. Don A. Ostler that our proposal to dispose Dry Valley NORM at the nearby Small Fry Mine has prompted a response raising several policy issues regarding management and disposal of NORM in Utah. In his letter, Mr. Ostler deferred the decision to the Division of Radiation Control and its Board. He indicated that a Radiation Control Board meeting may be the appropriate forum to take up discussion on the proposal, and suggested Molycorp contact you to be placed on the Agenda at the Board's regular April meeting. Our purpose is to formally present to the Board pertinent information regarding the Dry Valley site and the Small Fry Mine and to discuss disposal alternatives in order to facilitate the Board's decision—making process regarding management and disposal of this material.

At the April Board meeting, we can present information pertaining to the following key discussion items:

SITE DESCRIPTIONS

- * Dry Valley/Small Fry location site, history and physical setting
- * Nature and characterization of material, activity levels
- * Local, regional geologic settings and hydrogeology

REGULATORY AUTHORITY

- * Compliance requirements, procedures
- * NORM designation

DISPOSAL ALTERNATIVES

- * Objectives
- * Selection process
- * Site specific impacts of each alternative:
 - * Public access
 - * Monitoring
 - * Leachability
 - * Erosion
 - * Security
 - * Transportation
 - * Health Risk

Department staff familiar with the Dry Valley site and Small Fry proposal include Don Ostler and John Whitehead with Water Quality, Ray Nelson and John Hultquist with your Division and Holland Sheppard with the Division of Oil, Gas and Mining. Mr. Sheppard inspected the Small Fry Mine. It is recommended that these personnel attend the meeting.

Part of our presentation will require use of a 35mm slide projector and possibly an overhead projector. Kindly advise us if this presentation is appropriate for review by the Board, and if it can be scheduled for the April Board meeting. Please advise Molycorp of any additional items that need to be addressed during the course of our presentation.

Respectfully,

David R. Shoemaker Manager of Remediation

David R. Shamalan

DRS/bjd

cc: R. F. Clark

Don A. Ostler Holland Sheppard

G. R. Morris